



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

September 12, 2011

By Federal Express

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following enclosed additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1294	Certified copy of the docket sheet and other court filings for <u>United States v. Alphonse Persico</u> , 99 CR 10001 (KMM)(S.D. Fl.).

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1295	Certified copies of records of the Office of the Medical Examiner, Nassau County, New York ("Nassau County ME") regarding the autopsy performed on John Minerva (the reports and notes related to this autopsy were previously provided as Discovery Exhibits Nos. 358-362)
1296	Digital video disc ("DVD") containing photographs and x-rays taken by the Nassau County ME in connection with the autopsy of John Minerva
1297	Audio cassette containing the dictation tape of the Nassau County ME made in connection with the autopsy of John Minerva
1298	Certified copies of records of the Nassau County ME regarding the autopsy performed on Michael Imbergamo (the reports and notes related to this autopsy were previously provided as Discovery Exhibits Nos. 363-367)
1299	DVD containing photographs and x-rays taken by the Nassau County ME in connection with the autopsy of Michael Imbergamo
1300	Audio cassette containing the dictation tape of the Nassau County ME made in connection with the autopsy of Michael Imbergamo
1301	Business record certification affidavit of a representative of Verizon Wireless regarding the Verizon Wireless telephone and subscriber records for (917) 613-6734 for the period between April 1999 and June 1999 (previously produced as Discovery Exhibit No. 512)
1302	Certificate of Marriage of Ralph Dols and Kim Kennaugh, from Clarke County, Nevada
1303	Certificate of Marriage of Dino Saracino and April Bubak, from Clarke County, Nevada

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1304	Certified copies of records of the Office of the Chief Medical Examiner, City of New York ("NY OCME") regarding the autopsy performed on Francesco Marasa (the reports and notes related to this autopsy were previously provided as Discovery Exhibits Nos. 354-357)
1305	Certified copies of records of the NY OCME regarding the autopsy performed on Awjad Ennab (records related to this autopsy were previously provided as Discovery Exhibits No. 350)
1306	Certified copies of records of the NY OCME regarding the autopsy performed on Joseph Miccio
1307	Certified copies of records of the NY OCME regarding the autopsy performed on Ralph Dols (the reports and notes related to this autopsy were previously provided as Discovery Exhibits Nos. 490-494)
1308	New York City Police Department ("NYPD") Crime Scene Unit Report related to the March 18, 1994 homicide of Joseph Miccio
1309	NYPD Crime Scene Unit Photographs taken in connection with the March 18, 1994 homicide of Joseph Miccio
1310	Surveillance photographs taken April 19, 1996 of Thomas Gioeli, Alphonse Persico and others

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If you have any questions or requests, please
contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/James D. Gatta
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: Carl J. Herman, Esq. (by ECF) (w/o enclosures)
Louis V. Fasulo, Esq. (by ECF) (w/o enclosures)
David Stern, Esq. (by ECF) (w/o enclosures)
Jane Fisher-Byrialsen, Esq. (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)